IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

PROMOS TECHNOLOGIES, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 06-788 (JJF)
	)	
FREESCALE SEMICONDUCTOR, INC.,	)	
	)	
Defendant.	)	

PLAINTIFF PROMOS TECHNOLOGIES, INC.'S
THIRD NOTICE OF 30(b)(6) DEPOSITION
OF DEFENDANT FREESCALE SEMICONDUCTOR, INC.

PLEASE TAKE NOTICE that pursuant to Rules 26 and 30 of the Federal Rules of Civil

Procedure, plaintiff ProMOS Technologies, Inc. will take the deposition of defendant Freescale

Semiconductor, Inc. ("Freescale"), through its corporate designee(s), before a person authorized

to administer an oath at the offices of Ashby & Geddes, 500 Delaware Avenue, 8th Floor,

Wilmington DE 19899, commencing at 9:30 a.m. on January 14, 2007, or at such other date and

time as counsel for the parties shall agree, and continuing from day to day until completed. The

deposition may be recorded by audio-visual means as well as stenographically.

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Freescale shall

designate one or more officers, directors or managing agents, or other persons who consent to

testify on its behalf concerning the subjects identified in Attachment A, and if more than one

person is so named, designate for each person the subject or subjects on which that person will

testify.

ASHBY & GEDDES

/s/ *John G. Day*

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Dated: December 19, 2007
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2

ATTACHMENT A

1.   The design, layout, architecture, and structure of each of the products listed in Exhibit 1 hereto (each, a "Freescale Product" and collectively, the "Freescale Products").

2.   The identity of any product that incorporates or includes any Freescale Product.

3.   Code names, project designations, product families, part numbers and any other naming or grouping conventions used for Freescale Products.

4.   The features, functionality, uses, and operation of each Freescale Product and of each product that incorporates or includes a Freescale Product, including but not limited to the processor(s), core(s), cache memory(ies), cache controller(s), memory(ies), memory subsystem(s), memory controller(s), memory management unit(s), register(s), buffer(s), bus(es), bus interface unit(s), and all other portions thereof.

5.   User manuals, reference manuals, workbooks, datasheets, microarchitecture documents, block guides, specifications, and technical documents for each of the Freescale Products and/or the processor(s) or core(s) contained therein and/or each product that incorporates or includes a Freescale Product.

6.   RTL documentation and circuit schematics for each Freescale Product and/or the processors contained therein.

7.   Research, development, testing, and manufacturing of each Freescale Product, including the costs associated therewith.

8.   Documents (such as communications, data sheets, promotional or marketing materials) and things (such as demonstration boards or other implementations) provided by Freescale to or used by Freescale with its customers or distributors concerning the use of each Freescale Product and/or each product that incorporates or includes a Freescale Product, including

1

those relating to the installation, operation, structure, function, implementation and use of each

Freescale Product and/or each product that incorporates or includes a Freescale Product.

9.   The date of first use, first public use, and first sale for each of the Freescale

Products.

10.   Any efforts by Freescale to change or modify any Freescale Product to design

around any of the patents-in-suit, including all communications relating to such efforts.

11.   Freescale's consideration of and views about the use of system or external memory,

including but not limited to why it is essential and which of the Freescale Products either have

system or external memory or are specifically designed to work with system or external memory.

12.   Any prior art related to the patents-in-suit, including but not limited to designs

developed within Motorola or Freescale.

13.   Any contracts between Freescale and Motorola, whether written or otherwise,

including but not limited to any assumption by Freescale of Motorola's liability for any past,

present, or future claims of infringement.

14.   The features, functionality, uses, and operation of cache memory incorporated or

used by the Freescale Products, including but not limited to (a) the data path and connection

between the cache memory and the executing units of the processor or core; (b) the data path and

connection between the cache memory and the system, external or other memory; (c) data

transmission between the cache memory and the executing units of the processor or core; (d) data

transmission between the cache memory and the system, external or other memory; (e) the timing

and the interdependency (or the lack of it) between (c) and (d), (f) circuits, functions, macros,

programs or instructions related to the operation, function, or scheduling of cache memory, and (g)

circuits, functions, macros, programs or instructions related to the operation, function, or

2

scheduling of transmission of data and control information to or from the cache memory and to or from any registers or buffers associated with the cache memory.

15.   The similarities and differences between MC68060 and M68040, including but not limited to similarities and differences relating to (a) the data path and connection between the cache memory and the executing units of the processor or core; (b) the data path and connection between the cache memory and the system, external or other memory; (c) data transmission between the cache memory and the executing units of the processor or core; (d) data transmission between the cache memory and the system, external or other memory; (e) the timing and the interdependency (or the lack of it) between (c) and (d).

16.   The features, functionality, uses, and operation of circuits that affect the operation of the cache memory incorporated or used by the Freescale Products, including but not limited to (a) cache controller, (b) control logic of the cache memory, (c) cache control registers (d) tag memory, (e) memory management unit, and (f) memory controller.

17.   The features, functionality, uses, and operation of buffers, registers, or storage that affect the operation of the cache memory incorporated or used by the Freescale Products and/or any product that incorporates or includes a Freescale Product, including but not limited to data transmission and data path between such buffers, registers, or storage and (a) cache memory, (b) the executing units of the processor or core, and (c) system, external or other memory.

18.   The features, functionality, uses, and operation of system, external or other memory incorporated or used by the Freescale Products, including but not limited to (a) data transmission and data path between system or external memory with Freescale Products, (b) the type, specification, and requirement for system, external or other memory so that it works with Freescale Products; (c) how and why Freescale Products use or operate with system, external or

other memory, and (d) the features of the Freescale products that are specifically designed to work with system, external or other memory.

19.   Data coherency policy and snooping operation of the cache memory incorporated or used by the Freescale Products.

20.   Joint research and development effort relating to Freescale Products with third parties, including but not limited to joint efforts with ARM Holding PLC ("ARM") and International Business Machines Corp. ("IBM").

21.   Indemnification, insurance, guaranty, surety, or agreement under which any third party may be liable to satisfy part or all of a judgment of patent infringement relating to Freescale Products, including but not limited to any agreement between Freescale and Motorola, or any agreement between Freescale and ARM Holding PLC ("ARM").

22.   The types and locations of documents relevant to each of the foregoing topics.

23.   The similarities and differences among each of the Freescale Products, including similarities and differences relating to each of the foregoing topics.

EXHIBIT 1

603e
e200
e200z1
e200z0
e200z6
e300
e300c2
e500
e500v2
e600
dual e600
G2
G4
8xx
Coldfire v2
Coldfire v3
Coldfire v4
Coldfire v4e
Coldfire v5
MC68060
ARM 920T
ARM926EJ-S
ARM1136JF-S
800 MHz/1GHz
StarCore SC3400
DSP extended core
800 MHz/1GHz
StarCore SC3400
DSP core
SC1400
DSP 56300

any products that
incorporate any of
the foregoing cores

MPC7400
MPC7450
MPC604
MPC604e
MPC604ev
MPC603

MPC603e
MPC603ev
MPC601
MPC620
MPC750
MPC740
MPC755
MPC2605
K2
8569
8526
MPC5200
MPC5200B

MPC5510

MPC5553

MPC5554

MPC5561
MPC5565

MPC5566
MPC5567
MPC7410
MPC7445
MPC7455
MPC7447
MPC7457
MPC7447A
MPC7448
MPC823
MPC823E
MPC850
MPC852T
MPC853T
MPC855T
MPC857DSL
MPC857T
MPC859DSL
MPC859T
MPC860
MPC860P
MPC862
MPC866
MPC870

MPC875
MPC880
MPC885
MPC8247
MPC8248
MPC8250
MPC8255
MPC8260
MPC8264
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MPC8271
MPC8272
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MPC8313E
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MPC8360E
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MPC8540
MPC8541E
MPC8543E
MPC8544E
MPC8545E
MPC8547E
MPC8548E
MPC8555E
MPC8560
MPC8567E
MPC8568E

MPC8641

MPC8641D
MCF5206e
MCF5207
MCF5208
MCF5211

MCF5212
MCF5213
MCF5214
MCF5216
MCF5232
MCF5233
MCF5234
MCF5235
MCF5249
MCF5270
MCF5271
MCF5272
MCF5274
MCF5274L
MCF5275
MCF5275L
MCF5280
MCF5281
MCF5282
MCF5307
MCF5327
MCF5328
MCF5329
MCF5372
MCF5372L
MCF5373
MCF5373L
MCF5407
MCF5470
MCF5471
MCF5472
MCF5473
MCF5474
MCF5475
MCF5480
MCF5481
MCF5482
MCF5483
MCF5484
MCF5485
MC68060
MC68LC060
MC68EC060
i.MX1
(MC9328MX1)
i.MX21

i.MX21S
i.MX27
i.MX31
i.MX31L
i.MXL
i.MXS

MSC8144

MSC8144E

MSC8144EC
MSC7110
MSC7112
MSC7113
MSC7115
MSC7116
MSC7118
MSC7119
MSC7120

DSP56301

DSP56311

DSP56321

DSP56L307